

REMARKS

Claims 1-27 were pending in the above-identified application, of which claims 28-76 are withdrawn from consideration. Claims 1-27 were rejected. With this Amendment, claims 77-86 are added.

35 U.S.C. § 103 Obviousness Rejection of Claims

Claims 1-10, 12-17, 21-22 and 24-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Harrington* (U.S. Patent No. 6,775,820) in view of *Guthrie* (U.S. Patent No. 6,266,681). Applicant respectfully traverses this rejection.

Claim 1 recites "a memory for storing at least the script extracted from the receiving data, the memory being located on a server configured to receive and send data to a client; and computer-readable code for substituting a script calling portion in the document with a portion for calling the script stored in said memory."

In the office action, the Examiner admits that *Harrington* does not disclose "a memory for storing at least the script extracted from the receiving data, the memory being located on a server configured to receive and send data to a client" but instead contends that *Guthrie* discloses the well-known concept of a client/server environment and asserts that "where execution of software takes place does not impart novelty...in a client/server environment." Applicant respectfully disagrees.

Applicant submits there is simply no motivation to combine *Harrington* with *Guthrie*. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. MPEP Section. 2143.01 (emphasis added). Here, there is no such teaching, suggestion or motivation.

Harrington teaches that a web-based application using javascript can be re-coded in Visual Basic Script so that the application is compatible with a browser on an OS/2 operating system. Thus, the script in the *Harrington* document is merely rewritten to comply with the requirements of the OS/2 operating system. However, there is absolutely no teaching or

suggestion to modify *Harrington* to include a memory located on a server to store a script extracted from the receiving data. In fact, doing so would only unnecessarily complicate the system in *Harrington* since the OS/2 client environment includes functionality for executing scripts and thus would only be slowed down by having to request execution of a re-coded script from a server. Thus, Applicant respectfully submits that the Examiner's contention that it would have been obvious to store and execute scripts extracted from the receiving data on the server in *Harrington* is not correct.

By contrast, the present invention is directed to the display of a document on a portable device (for example, a pda or cellphone). As explained in the specification, it would be preferable not to include script executing functionality in such devices since doing so would complicate the device and increase its cost. (p. 7, lines 2-7). Thus, the present invention includes a memory for storing the extracted script on a server that is configured to receive and send data to the client. The extracted script may then be called and executed on the server, thereby eliminating the costs associate with providing such functionality on the client device. These advantages are neither taught or envisioned by the cited art. Thus, Applicant submits that claim 1 is allowable over the cited art. For the same reasons, Applicant also submits that independent claims 6, 10, and 22 are also allowable.

Applicant has also added new claims 77-86. In addition to the reasons discussed above, claims 77-86 also recite elements that are neither taught nor suggested by the cited references. In particular, Applicant submits that the cited references do not disclose "a script execution unit located on the server and configured to execute the script stored on the server upon receiving an instruction from the client to execute the script"(claim 77), or "a document cache to store the document received from the document server" (claim 78) Applicant also submits that the cited references do not teach that "upon execution of a script that indicates that a portion of the document is to be rewritten, the conversion apparatus is configured to rewrite the portion of the document stored in the document cache and send at least the portion of the rewritten document from the server to the client" (claim 79) or that "upon execution of a script that indicates that a portion of the document is to be rewritten, the conversion apparatus is configured to rewrite the portion of the document stored in the document cache, store at least the portion of the rewritten

document in the document cache, and send to the client a link to the rewritten document" (claim 80). Thus, Applicant submits that claims 77-80 are allowable. For the same reasons, Applicant also submits that claims 81-86 are also allowable.

Applicants submit that the application is in condition for allowance. Notice to that effect is requested.

Respectfully submitted,

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